REMARKS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-14 are pending in the present application. No claims are canceled, amended or added by the present amendment.

In the outstanding Office Action, Claims 1-5 and 10-14 were finally rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 5,649,218 to Saito in view of U.S. Patent No. 6,526,410 B1 to Aoyama et al. (herein "Aoyama") and U.S. Patent No. 5,983,248 to DeRose et al. (herein "DeRose"); and Claims 6-9 were finally rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,535,875 B2 to Takahashi et al. (herein "Takahashi") in view of U.S. Patent No. 6,230,173 B1 to Ferrel et al. (herein "Ferrel") and DeRose.

First, Applicants respectfully submit that rejections in the outstanding Office Action are prematurely made final. Although the Office Action does not include form paragraph 7.40, the Office Action appears to indicate that rejections are made final because claim amendments filed March 8, 2004, necessitated new grounds for rejection.[1] However, Applicants respectfully submit those claim amendments were made to better clarify and define the claimed invention. Further, as noted in MPEP § 706.07(a),

> While the rules no longer give to an applicant the right to "amend as often as the examiner presents new references or reasons for rejection," present practice does not sanction hasty and ill-considered final rejections. The applicant who is seeking to define his or her invention in claims that will give him or her the patent protection to which he or she is justly entitled should receive the cooperation of the examiner to that end, and not be prematurely cut off in the prosecution of his or her application.

Accordingly, Applicants respectfully request the finality of the rejections be withdrawn.

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[1] Office Action at page 9, paragraph 12.

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Claims 1-5 and 10-14 were rejected under 35 U.S.C. § 103(a) as unpatentable over Saito in view of Aoyama and DeRose. That rejection is respectfully traversed.

Claim 1 is directed to a document editing system for editing a document in a computer. The document editing system includes means for discriminating a specified plurality of document areas within an arbitrary area of the document and managing the specified plurality of document areas along with attributes assigned to the document areas. The document editing system also includes means for managing generation and deletion of a tag pair. The tag pair includes a start tag and an end tag and a unique identifier which is attached to each start and end tag. The unique identifier is different from a unique identifier attached to each other tag pair. In addition, the document editing system includes means for editing a character sequence provided in the document while information about the specified plurality of document areas within the document is retained or updated. Independent Claim 10 includes similar features.

In a non-limiting example, Figure 1 illustrates a document editing system that includes document area management means (1) (e.g., means for discriminating and managing), tag management means (2) (e.g., means for managing generation and deletion), and document editing means (3) (e.g., means for editing a character sequence). Figures 2 and 3 illustrate examples of documents edited by the document editing system and each of these documents includes two tag pairs that are managed by the tag management means (2). The tag pairs include a start tag and an end tag, and a unique identifier is attached to each start tag and end tag to identify document area A and document area B, for example.

Further, in Figures 2 and 3, document area A is identified by start tag r and end tag /r. A unique identifier "1" is attached to the start tag r by a colon, in this example. Thus, the start tag with the attached unique identifier is represented in this example by r:1. The unique identifier "1" is also attached to the end tag /r. Thus, the end tag with the attached unique

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identifier in this example is /r:1. Further, in the example of Figures 2 and 3, document area B

is identified by another start tag r and end tag /r each having "2" as an attached unique

identifier. Thus, document area B is identified by a start tag with attached unique identifier

r:2 and an end tag with attached unique identifier /r:2.

A document editing system thus arranged advantageously allows areas of the

document to be uniquely distinguished from one another, and this representation method

allows greater flexibility in representing the attributes of the document areas.[2] Further, by

using a unique identifier attached to each tag in a tag pair this arrangement advantageously

allows editing of documents having document areas which are nested or which partially

overlap even when using tags of the same type. For example, as shown in Figure 2, although

document areas A and B overlap and have the same type "r", the unique identifiers attached

to each start and end tag and associated with each document area allow the start and end of

each area to be uniquely identified.

As noted in the outstanding Office Action, Saito and Aoyama do not disclose a unique

identifier which is attached to each start and end tag.[3] Further, applicants respectfully submit

that DeRose also does not teach or suggest that feature, and applicants respectfully traverse

the assertion in the outstanding Office Action that it would have been obvious for one of skill

in the art at the time the invention was made to combine the teachings of Saito, Aoyama, and

DeRose to include a unique identifier which is attached to each start and end tag.[4]

In particular, the Office Action asserts that DeRose "discloses the representation of

the document further includes unique element identifiers assigned to each element in the

document (col. 4, lines 47-60)." However, in the cited passage, DeRose indicates that

> To facilitate the retrieval of these elements, the representation of the
> document further includes unique element identifiers assigned to each
> element in the document. The fields of the element directory store the

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[2] Specification at page 2, lines 16-23.
[3] Office Action at page 8, lines 6-8.
[4] Office Action at page 8, lines 14-16.

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unique numbers which are sequentially assigned to the elements in the document . . .

Thus, DeRose describes unique element identifiers stored in the fields of the element directory, and as shown in FIG. 6, the element directory 91 is an array "which is used to improve navigation of the document."[5] However, DeRose does not teach or suggest "a unique identifier which is attached to each start and end tag," as in independent Claims 1 and 10.

Further, applicants note that DeRose indicates that start tags may also include attributes, and attributes may be associated with unique identifiers, but tags are not attached to identifiers. For example, DeRose states that "[t]hese tags often have attributes which are variables, such as 'file', to which are assigned values, such as 'myfig12'."[6] Further, DeRose indicates the attributes may be used "for attaching a unique identifier for an element for cross-referencing or other uses."[7] However, as DeRose states above and indicates in the example of FIG. 4, the variables are attached to the attributes and the variables are not attached to the tags, as in the claimed invention. Thus, in FIG. 4, DeRose shows a tag 49 "ART" and an attribute "FILE." Further, in this example, a value "MYFIG12" (e.g., unique identifier) is attached to the attribute "FILE." However, the value "MYFIG12" is not attached to the tag "ART." Hence, DeRose does not describe identifiers attached to tags, and therefore, the teachings of DeRose, Saito and Aoyama do not teach or suggest "a unique identifier which is attached to each start and end tag," as in independent Claims 1 and 10.

Accordingly, applicants respectfully submit that independent Claims 1 and 10, and claims depending therefrom, are allowable.

Claims 6-9 were rejected under 35 U.S.C. § 103(a) as unpatentable over Takahashi in view of Ferrel and DeRose. That rejection is also respectfully traversed.

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[5] DeRose at column 9, lines 23-24.
[6] DeRose at column 9, lines 2-4.
[7] DeRose at column 9, lines 6-9.

Claim 6 is directed to a method of preparing a tag information management table for editing a document, including determining whether or not an arbitrary character string within the document is selected and acquiring tag information pieces if it is determined that the arbitrary character string is selected. The tag information pieces include a kind of tag pair assigned to a document area and a position of a start tag and a position of an end tag. Further, the method includes assigning a nonoverlapping unique tag ID to the acquired tag information pieces and storing a link between the nonoverlapping unique tag ID and the tag information pieces in the tag information management table.

As discussed above with regard to the non-limiting examples of Figures 1-3, a nonoverlapping unique tag ID is assigned to each of the acquired tag information pieces. In particular, tag information pieces, which include for example, start tag r and end tag /r, are each assigned the nonoverlapping unique identifier "1".
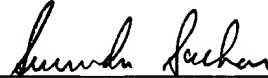
Applicants respectfully submit that Takahashi and Ferrel also does not teach or suggest tag pairs with unique identifiers. Further, as discussed above, DeRose describes assigning identifiers to attributes, and does not teach or suggest assigning identifiers to tags. Hence, applicants respectfully submit that DeRose, Takahashi and Ferrel do not teach or suggest "assigning a nonoverlapping unique tag ID to the tag information pieces," as in independent Claim 6.

Accordingly, applicants respectfully submit that independent Claim 6 and claims depending therefrom are allowable.

Consequently, in light of the above discussion, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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